

1 Arezoo Jamshidi (Bar No. 284220)
2 *ajamshidi@hbblaw.com*
3 Allison E. Harvey (Bar No. 356525)
4 *aharvey@hbblaw.com*
5 Haight Brown & Bonesteel LLP
6 *edocs@hbblaw.com*
7 402 West Broadway, Suite 1850
8 San Diego, California 92101
9 Telephone: 619-595-5583
10 Facsimile: 619-595-7873
11

12 Attorneys for Defendants THE GUILD LAW SCHOOL DBA
13 PEOPLE'S COLLEGE OF LAW, JOSHUA GILLENS,
14 WILLIAM MAESTAS, BOARD OF DIRECTORS FOR THE
15 PEOPLE'S COLLEGE OF LAW, CHRISTINA MARIN
16 GONZALEZ; ROGER ARAMAYO; ISMAIL VENEGAS;
17 CLEMENTE FRANCO; HECTOR PENA; PASCUAL
18 TORRES; CAROL DEUPREE; JESSICA VIRAMONTES;
19 JUAN SARINANA; ADRIANA ZUNIGA; PREM SARIN;
20 DAVID BOUFFARD; and HECTOR SANCHEZ
21

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
14

15 TODD R. G. HILL,
16 Plaintiff,

17 v.

18 THE BOARD OF DIRECTORS,
19 OFFICERS AND AGENTS AND
20 INDIVIDUALS OF THE PEOPLES
21 COLLEGE OF LAW; et al.

Defendants.

Case No. 2:23-cv-01298-JLS-BFMx

**DEFENDANTS' OPPOSITION TO
PLAINTIFF'S REQUEST TO FILE
"SURREPLY" TO OPPOSITION TO
REQUEST TO FILE PROPOSED
FIFTH AMENDED COMPLAINT**

Judge: Josephine L. Staton
Magistrate: Brianna Fuller Mircheff

22 TO THE HONORABLE COURT AND TO ALL PARTIES AND THEIR
23 COUNSEL OF RECORD:

24 Defendants THE GUILD LAW SCHOOL DBA PEOPLE'S COLLEGE OF
25 LAW, JOSHUA GILLENS, WILLIAM MAESTAS, BOARD OF DIRECTORS
26 FOR THE PEOPLE'S COLLEGE OF LAW, CHRISTINA MARIN GONZALEZ;
27 ROGER ARAMAYO; ISMAIL VENEGAS; CLEMENTE FRANCO; HECTOR
28 PENA; PASCUAL TORRES; CAROL DEUPREE; JESSICA VIRAMONTES;

1 JUAN SARINANA; ADRIANA ZUNIGA; PREM SARIN; DAVID BOUFFARD;
2 and HECTOR SANCHEZ respectfully requests this Court to deny Plaintiff's
3 Request for Leave to File Surreply in Response to Dockets 319 and 321 Pursuant to
4 Docket 311 [Dkt. No. 323.]

5 **I. INTRODUCTION**

6 Plaintiff's request to file a "short clarification" is not a clarification at all, it is
7 a ten-page surreply that reiterates arguments already briefed and attempts to reframe
8 the procedural posture of this case. As Defendant Spiro noted in his opposition [Dkt.
9 No. 324], Plaintiff again raises the same points already addressed in briefing on the
10 motions to dismiss the Fourth Amended Complaint—that incorporation by reference
11 is permissible, the proposed amendments are streamlined, and that there is no undue
12 delay or bad faith. The Court should deny Plaintiff's request to file his proposed
13 surreply which continues to repeat the same arguments through successive,
14 improper filings. Plaintiff has had ample opportunity to brief these issues, and no
15 new justification exists for further response.

16 **II. PLAINTIFF MISCHARACTERIZES THE COURT'S "INVITATION"**
17 **IN DOCKET 311**

18 Plaintiff's request relies heavily on the Court's language in Docket No. 311,
19 asserting that the Court extended an "express invitation" to file additional briefing.
20 However, Plaintiff's reliance is misplaced. Docket 311 was issued in response to
21 Plaintiff's improper unilateral "Notice of Submission" and proposed Fifth Amended
22 Complaint [Dkt. No. 310] and merely directed Plaintiff to submit a redline
23 comparison between the Fourth and Fifth Amended Complaints.

24 This directive does not constitute a grant of leave to file a surreply, nor does it
25 suggest that Plaintiff's procedural tactics—namely, attempting to file an amended
26 pleading while motions to dismiss the operative Fourth Amended Complaint remain
27 pending—are proper or condoned. The Court's directive was limited to formatting
28 clarity, not a blanket invitation for further briefing or argument.

III. PLAINTIFF’S REQUEST UNDER THE GUISE OF “FAIRNESS” IS MISPLACED

Plaintiff contends that the Ninth Circuit favors granting leave to amend based on principles of fairness and the substance of the proposed amendment. However, Plaintiff ignores the procedural posture of this case and the repeated opportunities already provided to amend the complaint. The issue is not whether leave to amend is ever appropriate, it is whether Plaintiff may continue to circumvent rulings on pending motions by filing new complaints midstream, without leave and without addressing the repeated deficiencies identified by Defendants and this Court.

As Defendant Spiro accurately observed, allowing Plaintiff to continually respond to motions to dismiss through the filing of new amended complaints would create an endless cycle in which Plaintiff could continuously amend the complaint to avoid rulings on its legal sufficiency. [See Dkt. No. 319.] Plaintiff would effectively evade dismissal without leave to amend by filing new versions before the Court can rule.

Moreover, Plaintiff has not demonstrated that the proposed Fifth Amended Complaint meaningfully cures the legal deficiencies that have been the subject of multiple motions to dismiss. Plaintiff’s vague assertion that the new complaint is “streamlined” or “narrowed” does not substitute for the substantive showing required. Absent such a showing, fairness does not support further amendment—it supports finality.

IV. CONCLUSION

For the foregoing reasons, Defendant respectfully requests that the Court deny Plaintiff’s request for leave to file a surreply. Plaintiff’s ten-page filing is yet another attempt to reargue points already briefed, relies on a misreading of the Court’s prior orders, and continues a pattern of procedural gamesmanship that should not be rewarded.

1 DATED: June 13, 2025

HAIGHT BROWN & BONESTEEL LLP

2
3
4 By:


Arezoo Jamshidi

Allison E. Harvey

Attorneys for Defendants THE GUILD
LAW SCHOOL DBA PEOPLE'S
COLLEGE OF LAW, JOSHUA
GILLENS, WILLIAM MAESTAS,
BOARD OF DIRECTORS FOR THE
PEOPLE'S COLLEGE OF LAW,
CHRISTINA MARIN GONZALEZ;
ROGER ARAMAYO; ISMAIL
VENEGAS; CLEMENTE FRANCO;
HECTOR PENA; PASCUAL TORRES;
CAROL DEUPREE; JESSICA
VIRAMONTES; JUAN SARINANA;
ADRIANA ZUNIGA; PREM SARIN;
DAVID BOUFFARD; and HECTOR
SANCHEZ

Haight

PROOF OF SERVICE

Hill v. The Board of Directors, Officers, et al.
Case No. 2:23-cv-01298-JLS-CFM

STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Contra Costa, State of California. My business address is 1255 Treat Blvd., Suite 610, Walnut Creek, CA 94597.

On June 13, 2025, I served true copies of the following document(s) described as:

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S REQUEST TO FILE
"SURREPLY" TO OPPOSITION TO REQUEST TO FILE PROPOSED
FIFTH AMENDED COMPLAINT**


on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address pjohnson@hbblaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 13, 2025, at Walnut Creek, California.


Paula M. Johnson

SERVICE LIST

Hill v. The Board of Directors, Officers, et al.
Case No. 2:23-cv-01298-JLS-CFM

Todd R. G. Hill
41459 Almond Avenue
Quartz Hill, CA 93551

PRO SE

Email: toddryangregoryhill@gmail.com

Robert Ira Spiro
Spiro Law Corp
10573 West Pico Boulevard No 865
Los Angeles, CA 90064

Attorney for Robert Ira Spiro

Email: ira@spirolawcorp.com

Jean Roche Krasilnikoff
The State Bar of California
180 Howard Street
San Francisco, CA 94105-1639

Attorney for Defendants Suzanne Celia
Grandt, Vanessa Holton, et al.

Email: Jean.Krasilnikoff@calbar.ca.gov

Haight